

From: Elise Semonian
Sent: Wednesday, August 19, 2015 10:06 AM
To: CEQA Guidelines
Subject: comments on draft guidelines

I have quickly read over
http://opr.ca.gov/docs/Preliminary_Discussion_Draft_Package_of_Amendments_to_the_CEQA_Guidelines_Aug_11_2015.pdf
and have the following thoughts related to the changes proposed to the checklist:

IX(c)(iii) on flooding – can “flooding” be defined to better address negative environmental impacts? Water level above FEMA base flood elevation? What about a project that restores a creek and intentionally retains water to “flood” a park/detention basin, but it is above the BFE and reduces flooding in the flood hazard area? Maybe this is not a common issue – but something our Town is currently considering, so it came to mind.

XVIII(c) seems like this should be limited to infrastructure that exacerbates fire risk. It seems like the environmental impacts of infrastructure may be sort of a “redundant” criteria as these impacts should be considered with the whole project. The proposed checklist item almost implies the impacts will not otherwise be considered in the review. For example, a fire road necessary for a project should be considered in the overall project and its environmental impacts (temporary or permanent) should be considered as part of the larger project environmental review.